



July 4, 2016

EPA SBAR Panel
Small Business Entity
#2 Feedback

Hi Niva,

Thank you for the consideration of our opinions and input. If I can help in any way just let me know. Here are a few thoughts I think that may be valid in regards to Methylene Chloride and NMP;

1. I truly believe that these substances should not be available to the general public by any size or quantity. Homeowners can sometimes barely be effective in handling standard house paints without making a mess. This speaks to itself.
2. There are conditions that exist, such as stripping a hand-carved front door, expensive cabinets or antique furniture that require a gel/liquid stripper. Other means of finish elimination do not work due to wood profile damage. Selling these components only in a 55 gallon drum will destroy this sector of the industry.
3. All states handle paint contractor licensing in separate fashion (some not at all). I do believe that if a paint contractor was to be required to hold a federal license in order to obtain products containing the elements in question this could allow this small segment of the industry to still operate. Products should only be vended through actual paint stores and not Home Depot and the likes. Having the licensing process annually be somewhat costly (\$400-\$500) could possibly keep the average homeowner at bay.
4. Licensing could be similar to EPA RRP Rule.
5. For smaller businesses, 1 gallon containers are critical. 55 gallon drums are impractical for most painting contractors.

Sincerely,

Donny Fargo

Fargo Painting – P.O. Box 72660, Phoenix AZ 85050 - 623-869-7271
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